

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KATHERINE YOST,

Plaintiff,

v.

EVERYREALM INC., REPUBLIC, REPUBLIC CRYPTO LLC, OPERATIONS LLC, OPENDEAL INC., OPENDEAL PORTAL LLC, JANINE YORIO, in her individual and professional capacities, WILLIAM KERR, in his individual and professional capacities, and ZACH HUNGATE, in his individual and professional capacities,

Defendants.

Index No.: 1:22-cv-06549(PAE)(SLC)

**DECLARATION OF
SHANE SEPPINNI**

I, SHANE SEPPINNI, pursuant to 28 U.S.C. § 1746 affirm as follows:

1. I submit this Declaration in support of Plaintiff's Opposition to Defendants' Order to Show Cause to Compel Arbitration.
2. The AAA transmitted the attached Appointment Notice to me via email. A true and correct copy of this letter is attached as Exhibit A.
3. A true and correct copy of the AAA Employment Dispute Rules are attached at Exhibit B.
4. A true and correct copy of the AAA Employment/Workplace Fee Schedule is attached as Exhibit C.
5. A true and correct copy of a letter sent by 12 Attorneys General on November 12, 2019, to the AAA regarding concerns over organization's fees, among other issues, is attached as Exhibit D.

6. Based upon past fees for court reporting and transcription services charged by the Court Reporting Service Steno, Inc. to my law firm, I estimate that the stenographer costs in Yost's Arbitration will exceed \$10,000.

7. The per diem cost of a court reporter is about \$750 and transcription costs usually run about \$350.

8. Ms. Yost paid only \$60 to retrieve the transcript from the Court's October 6, 2022 hearing.

9. Defense counsel, when asked by the arbitrator if the proceedings against Yost, Johnson, Frimpong, and another individual should proceed as one action or separate actions, stated, that the Claimants' position was that the arbitration should proceed as one action, under one arbitrator.

Dated: March 10, 2023

/s/ Shane Seppinni